#### RICHARD E. TANASI, ESQ.

Nevada Bar No. 9699

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# TANASI LAW OFFICES

8716 Spanish Ridge Ave., Ste. 105

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Attorney for Defendant

# UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF NEVADA,	Case No: 2:19-cr-00300-04-JCM-EJY
Plaintiff,	
vs.	) SEALED STIPULATION AND ORDER
Marlon Echon Melu, et al	TO CONTINUE SENTENCING HEARING (Third Request)
Defendant.	)

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Simon F. Kung Assistant United States Attorney, MARLON ECHON MELU, by and through her attorney, Richard E. Tanasi, Esq., that the Sentencing Hearing in the above-captioned matter, now scheduled for February 24, 2021 at the hour of 11:00 a.m., be vacated and continued to a time convenient for the Court after September 27, 2021 (after Trial for the co-defendants has concluded; ECF 185).

Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

- 1. The parties need more time for Mr. Melu to cooperate with the government.
- 2. Mr. Melu is out of custody and does not object to this continuance.
- 3. The additional time requested herein is not sought for purposes of delay.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

WHEREFORE, the parties respectfully request that this Honorable Court accept the Stipulation and enter an Order as set forth below, continuing the sentencing hearing for date convenient to the Court, after September 27, 2021.

DATED this 3rd day of February, 2021.

#### U.S. ATTORNEY'S OFFICE

## /s/ Simon F.Kung

Simon F. Kung

Assistant United States Attorney

501 Las Vegas Boulevard South

**Suite 1100** 

Las Vegas, NV 89101

simon.kung@usdoj.gov

Attorney for the UNITED STATES

#### /s/ Richard Tanasi

RICHARD E. TANASI, ESQ.

Attorney for the Defendant

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2	UNITED STATE	S DISTRICT COURT
3	DISTRICT OF NEVADA	
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5	UNITED STATES OF NEVADA,	) Case No: 2:19-cr-00300-04-JCM-EJY
6	Plaintiff,	)
7	vs.	) SEALED ORDER ON STIPULATION
8	Marlon Echon Melu, et al	)
9	Defendant.	
10		_

This matter coming before the Court on Stipulation to Continue Sentencing Hearing, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

WHEREFORE, IT IS HEREBY ORDERED, that the Sentencing Hearing in the above-captioned matter, now scheduled for February 24, 2021, at the hour of 11:00 a.m., be vacated and continued to October 13, 2021 at 10:00 a.m.

DATED February 8, 2021.

# 8716 Spanish Ridge Ave., Ste. 105 Las Vegas, Nevada 89148 702-906-2411 • Fax 866-299-5274

### **CERTIFICATE OF ELECTRONIC SERVICE**

I HEREBY CERTIFY that I am an employee of Tanasi Law Offices, that on the 3rd day

of February 2021, the undersigned served a true and correct copy the foregoing

STIPULATION AND ORDER by U.S. District Court CM/EMF Electronic Filing to:

Simon F. Kung

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Attorney for the UNITED STATES

/s/ Richard Tanasi

An employee of TANASI LAW OFFICES